

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

MASTODON DESIGN LLC	)	
	)	
Plaintiff,	)	
v.	)	Civil Action No. 1:19-cv-1339 LO/TCB
	)	
VIZOCOM ICT LLC,	)	
	)	
Defendant.	)	
_____	)	

**STIPULATED INJUNCTION**

THIS MATTER having come before the Court on the stipulation of the parties, as evidenced by the signature of their respective counsel below, to the entry of a permanent injunction, it is hereby ORDERED:

1. Vizocom ICT LLC, and its employees, officers, directors, insurers, agents, representatives, successors, assigns, affiliates, and subsidiaries, and all those in concert or participation with them (collectively, “Vizocom”), are permanently enjoined from:
  - (a) Using the marks “MD”, “MD1008-1710-01” (“Mastodon Marks”) or any other trademark, service mark, name, logo or source designation of any kind that is confusingly similar to the Mastodon Marks in connection with the promotion, advertising or offering for sale of Vizocom’s products or services;
  - (b) Otherwise competing unfairly with Plaintiff in any manner; and
  - (c) Conspiring with, aiding, assisting or abetting any other person or business entity in engaging in or performing any of the activities referred to in subparagraphs (a) and (b) above.

2. The Court shall retain jurisdiction to enforce the provisions of this Injunction, or should a dispute arise between the parties concerning the meaning or enforcement of this Injunction.

3. The Parties shall each bear its own attorney's fees and costs incurred in connection with this action.

SO ORDERED on this \_\_\_\_\_ day of \_\_\_\_\_, 2019.

\_\_\_\_\_  
Judge Liam O'Grady  
United States District Judge

Respectfully submitted,

/s/ Richard C. Sullivan, Jr.  
Richard C. Sullivan, Jr. (VSB 27907)  
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*Counsel for Vizocom ICT LLC*

**Certificate of Service**

I hereby certify that on this 26<sup>th</sup> day of November, 2019, I caused the foregoing Stipulated Injunction to be served upon the following individual by the electronic filing system and individual email:

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/s/ Richard C. Sullivan, Jr.